



WESTERN AGRICULTURAL PROCESSORS  
ASSOCIATION

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To whom it may concern;

My name is Chris McGlothlin, and I am the Director of Technical Services for the Western Agricultural Processors Association (WAPA). WAPA represents tree nut hullers and processors of the four major tree nut commodities (almonds, pistachios, walnuts, and pecans) found throughout the state. I am writing you today to discuss several points made in the recent draft of the 2030 Scoping Plan. In this letter, I have highlighted and included specific portions of the draft document that we agree with or would like to discuss.

***“(3) Innovate resolution of biomass disposal needs such that excess agricultural and forest biomass can be used to advance statewide objectives for renewable energy fuels...” (Pg. 60)***

WAPA would like to express support for the plan to expand and revitalize the biomass and composting industries. Orchard commodities have witnessed the increased prices associated with orchard removal and chipping or grinding. In tree nut hulling and processing, nuts are sorted away from other material that is picked up in harvest, and they are also separated away from shells and hulls. Due to the closure of several biomass plants, these facilities have also experienced a lack in solutions on what to do with this material. In the end, these facilities are left with large piles of by-product material with nowhere to go. Currently, the only two solutions available for this material include hauling the material to a landfill which creates more transportation emissions, as well as increased carbon emissions which are discussed further in the draft. The secondary solution is to allow for the burning of this material in a controlled setting. It should be stated that the burning of this by-product material is not considered a preferred practice. These facilities would much rather see the material utilized to generate alternative fuel and energy. We would support the development of further funding to make these biomass/biogas facilities more prevalent throughout the Valley.

***“A large fraction of the organics in the waste stream can be diverted from landfills to composting or digestion facilities to produce beneficial products.” (Pg. 70).***

***“Support the expansion of infrastructure for compost where necessary, and map out the mechanisms for composting in each community.” (AB32 EJAC recommendations, pg. 17)***

WAPA would also like to support the inclusion of composting facilities as a beneficial avenue for this material. Throughout the Scoping Plan, composting is hailed as a solution to redirect agricultural material from landfills, and provide some beneficial use to maintain the carbon sequestration abilities of working lands. Emissions generated from composting account for only half a million tonnes of CO<sub>2</sub>e in 2014, while emissions generated at landfills are quantified as being over 10x greater.

WAPA would like to point out that there are significant flaws in the availability an agricultural operation has to develop a composting operation. WAPA has worked with a walnut hulling facility in the Valley that would like to utilize the walnut by-products separated at the facility, mix that by-product material with a small amount of manure, and utilize that compost on their own facility. Non-commercial composting operations require permits from the County in which the facility is located, the Regional Water Quality Control Board, the San Joaquin Valley Air Pollution Control District, as well as CalRecycle. There are practices that are granted a more streamlined approach, dependent on what feedstock and other materials are being utilized. For this facility in particular, the inclusion of dairy manure creates a more difficult pathway for permitting through several of these state agencies. The inclusion of that manure has created the requirement for a CEQA style analysis, as well as a hydrogeological study to determine the threat the facility poses on the land that will be used, as well as the water table that sits below the compost. We would ask that California Air Resources Board take the initiative to help further streamline these efforts to promote composting and the development of the beneficial carbon sink found on working lands throughout the Valley.

***“The interaction of...the use of renewable natural gas with the direct GHG reductions for the industrial sectors would need to be further examined to understand any complementary nature and net impact on reductions from the combined actions.” (Pg. 95)***

WAPA has concerns over the increased utilization of renewable gas. As stated above, the reductions and effects of a requirement like that have yet to be studied and quantified. The cost of a requirement like this has yet to be quantified, and in the end could be an undue burden on both businesses and citizens alike.

Thank you for this opportunity to comment on the draft Scoping Plan. If you have any questions or comments for me, please feel free to reach me at (559)-455-9272 or at [chris@agprocessors.org](mailto:chris@agprocessors.org).

Thank you,



Chris McGlothlin

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